

JAP:AFM

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 1546)

ADEBISOLA OMOTAYO ADESANMI,

Defendant.

- - - - - X

EASTERN DISTRICT OF NEW YORK, SS:

BRYAN EISENBERG, being duly sworn, deposes and states that he is a Special Agent with the United States Department of State, Diplomatic Security Service (“DSS”), duly appointed according to law and acting as such.

*Z1 Btce*  
On or about February 10, 2018, within the Eastern District of New York and elsewhere, the defendant ADEBISOLA OMOTAYO ADESANMI did knowingly and willfully use and attempt to use a United States visa that was procured by means of a false claim or statement and otherwise procured by fraud and unlawfully obtained.

(Title 18, United States Code, Section 1546)

The source of your deponent’s information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with DSS. I have been involved in the investigation of multiple cases involving visa fraud. My information comes from a joint

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

investigation with DSS and United States Customs and Border Protection (“CBP”). I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation, including but not limited to United States Customs and Border Protection (“CBP”) officers.

*ZIBH*

2. On February 10, 2018, the defendant ADEBISOLA OMOTAYO ADESANMI arrived at John F. Kennedy International Airport on Qatar Airlines flight number 20 from Doha, Qatar. The defendant presented to a CBP officer a valid Nigerian passport and a B1/B2 United States entry visa with foil number L8997675, both in the name of ADEBISOLA OMOTAYO ADESANMI. The defendant’s B1/B2 visa was issued by the United States Bureau of Consular Affairs in Lagos, Nigeria on December 15, 2016.

3. The defendant ADEBISOLA OMOTAYO ADESANMI was referred for a secondary inspection.

4. CBP officers reviewed the written notes of the State Department officer who adjudicated the defendant ADEBISOLA OMOTAYO ADESANMI’s visa application in Lagos, Nigeria. The notes indicated that, during her visa interview, ADESANMI stated that she was married and pregnant and was visiting the United States to give birth, adding that she would be staying with a cousin in Texas.

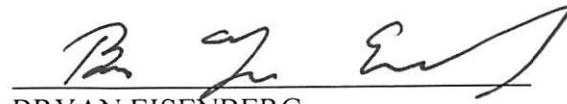
5. The defendant ADEBISOLA OMOTAYO ADESANMI was interviewed and stated that she was childless, that she had been four months pregnant at the time of her December 2016 visa interview in Lagos, Nigeria, and that her pregnancy had terminated in January 2018. After officers asked ADESANMI how she could have been

pregnant from August 2016 to January 2018, she admitted that she was never married and had not been pregnant at the time of her visa application interview.

6. CBP officers then notified me of the defendant ADEBISOLA OMOTAYO ADESANMI's statement. I came to the room where ADESANMI was being interviewed and read ADESANMI her Miranda rights, which she acknowledged and agreed to waive. ADESANMI said that she had not told the truth to the interviewing consular officer in Lagos, Nigeria when she claimed to have completed her United States visa application by herself. ADESANMI said that in fact she had used an agent, who completed the application using fraudulent information, including the untrue statements that the defendant was married and pregnant; was traveling to the United States to give birth; and worked at a bank. ADESANMI said that the agent had procured an accomplice to pose as the defendant's husband during the visa interview and had provided fraudulent medical documentation and bank statements. ADESANMI said that she had paid the agent 50,000 Nigerian naira for the agent's services.

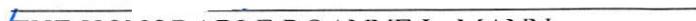
7. The defendant ADEBISOLA OMOTAYO ADESANMI was placed under arrest.

WHEREFORE, your deponent respectfully requests that the defendant  
ADEBISOLA OMOTAYO ADESANMI be dealt with according to law.



BRYAN EISENBERG  
Special Agent  
United States Department of State  
Diplomatic Security Service

Sworn to before me this  
22nd day of February, 2018



THE HONORABLE ROANNE L. MANN  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK